

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ICONTROL NETWORKS, INC.

Plaintiff,

v.

ALARM.COM INCORPORATED;  
FRONTPOINT SECURITY SOLUTIONS, LLC

Defendants.

Civil Action No. 1:13-cv-834-LMB/IDD

**JURY TRIAL DEMANDED**

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**DECLARATION OF MARY A. PROCACCIO-FLOWERS IN SUPPORT OF  
PLAINTIFF ICONTROL NETWORKS, INC.'S RESPONSE TO ALARM.COM'S  
MOTION TO SEAL**

I, Mary A. Procaccio-Flowers, declare as follows:

1. I am an attorney of the law firm of Wilson Sonsini Goodrich & Rosati, counsel for Plaintiff iControl Networks, Inc. ("iControl"). I am admitted to the bar in the State of California, and I am admitted *pro hac vice* in this case. I make this declaration on my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would do so competently.

2. Attached to Alarm.com's Motion to Compel a Complete Answer to Request for Production Number 89 and to Produce Documents from the Confluence System (Doc. No. 72) ("Motion to Compel") are limited portions from the depositions of three iControl principals that contain testimony concerning the non-public specifications of certain of iControl products.

3. The information contained in the deposition testimony referred to in paragraph 2 is not generally known to the public and the disclosure of it would cause competitive harm to iControl.

4. The specific information that Alarm.com seeks to seal is proprietary and relates to information concerning the functionality of iControl's software products and internal document management system.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on November 13, 2013 in Palo Alto, California.

*Mary A. Procaccio-Flowers*

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Mary A. Procaccio-Flowers

Dated: November 13, 2013

Respectfully submitted,

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*Counsel for Plaintiff iControl Networks, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2013, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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